

FILED
U.S. DISTRICT COURT
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

DEC 12 2001

2001 DEC 13 A 10:49

ALLIED SIGNAL TECHNICAL
SERVICES CORPORATION,

Plaintiff,

v.

M/V DAGMAR MAERSK, etc., et al.,

Defendants.

Civil Action No.: WMN 00-CV-3730

DEPUTY

**JOINT MOTION FOR EXTENSION
OF DISCOVERY SCHEDULE**

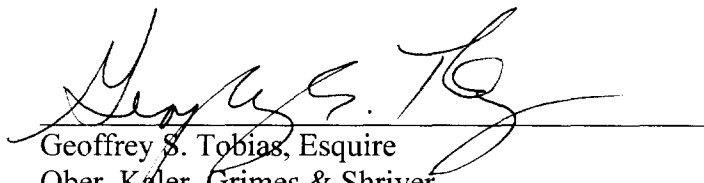
The four parties to this litigation herewith move for an extension of the discovery deadline in this admiralty cargo matter and for reasons state:

1. The present discovery deadline is December 31, 2001.
2. The several parties have exchanged interrogatories. One set of responses is overdue.
3. The parties have also exchanged Requests for Production, and responses thereto are a pre-condition to additional, deposition, discovery. While defendant J. S. Connor has, apparently, completed its document production, plaintiff's production is incomplete. Defendant Maersk, Inc., has been delayed in producing its documents because some of them exist only in electronic form and retrieval of papers so old has proven difficult. In addition, little documentation was generated in Baltimore; most was created in Italy.

" APPROVED " THIS 13th DAY
OF December, 20 01
William J. Connor
UNITED STATES DISTRICT JUDGE

2001

WHEREFORE, in order to permit the orderly completion of discovery in this matter, the parties request an additional sixty days, through the 8th of March, 2002, within which to complete discovery. I am authorized to file this Motion on behalf of all parties.



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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ALLIED SIGNAL TECHNICAL
SERVICES CORPORATON,

Plaintiff,

v.

M/V DAGMAR MAERSK, etc., et al.,

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Civil Action No.: WMN 00-CV-3730

NOTICE OF SERVICE

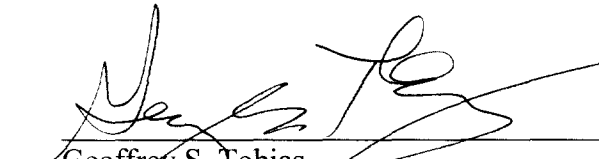
I hereby certify that on this 10th day of December, 2001, a copy of the Joint Motion for

Extension of Discovery Schedule was sent by first class mail, postage prepaid to:

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